



UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD

REGION 29
TWO METRO TECH CENTER STE 5100
FL 5
BROOKLYN, NY 11201-3838

Agency Website: www.nlrb.gov
Telephone: (718)330-7713
Fax: (718)330-7579

January 12, 2023

VIA ECF E-FILING ONLY

Hon. James R. Cho
U.S. Magistrate Judge
U.S. District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Poor v. Starbucks Corp.
Case No. 1:22-cv-07255

Dear Judge Cho:

Petitioner Teresa Poor on behalf of the National Labor Relations Board, by her undersigned counsel, files this letter jointly with Respondent Starbucks Corporation.

Counsel for Petitioner and for Respondent have met and conferred, in accordance with Fed. R. Civ. P. 37(a)(1), regarding certain objections Petitioner has concerning the subpoenas *duces tecum* that Respondent has served upon five (5) of its former employees and two (2) officials of Workers United, the labor organization involved in this case.

Petitioner contends that the subpoenas contain requests that are coercive and infringe upon employee rights under the National Labor Relations Act, are overly broad, seek irrelevant information and/or go beyond the scope of the limited discovery authorized by the Court. Although the parties met and conferred, they were unable to resolve the dispute over the subpoenas. As such, Petitioner intends to file a Motion to Quash on or before January 13, 2023. Petitioner further informed Respondent that, based upon belief, the subpoenaed non-parties also intend to file Motions to Quash. Respondent will file its opposition to the Motion(s) to Quash no later than January 27, 2023, or such time as the Court may direct.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Matthew A. Jackson", written over a horizontal line.

Matthew A. Jackson
Counsel for Petitioner